

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION

FILED-CLERK
U.S. DISTRICT COURT
2013 JUN 27 PM 1:03
TEXAS-EASTERN

UNITED STATES OF AMERICA
v.
SHANNON GUESS RICHARDSON

§
§
§
§
§

BY _____
No. 5:13-CR-13
(Judge MHS/CMC)

INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

COUNT 1

VIOLATION: 18 U.S.C. § 871(a)
[Threat Against President of the United States]

On or about May 20, 2013, in the Eastern District of Texas, the defendant,
Shannon Guess Richardson, did knowingly and willfully deposit for conveyance in the
mail and for a delivery from any post office and by any letter carrier a letter, paper,
writing, and document containing a threat to inflict bodily harm upon the President of the
United States, specifically a letter containing the toxin ricin and the following language:

You will have to kill me and my family before you get my guns.
Anyone wants to come to my house will get shot in the face. I
served in the united states army and because your muslim ass will
proably never be able to retire. I will have to work until I take my last
breath. I deserve better and so do my wife and kiddos. I will take
care of this myself and make sure you wont be runnin this country in
the ground any further. What's in this letter is nothing compared to
what ive got in store for you mr president.

All in violation of 18 U.S.C. § 871(a).

COUNT 2

VIOLATION: 18 U.S.C. § 876(c)
[Mailing Threatening Communication]

On or about May 20, 2013, in the Eastern District of Texas, the defendant, **Shannon Guess Richardson**, did knowingly deposit in any post office or authorized depository for mail matter, to be sent and delivered by the Postal Service and knowingly caused to be delivered by the Postal Service according to the direction thereon, a communication addressed to Mayor Michael Bloomberg, City Hall, New York, NY 10007, and containing a threat to injure the person of the addressee, specifically a letter containing the toxin ricin and the following language:

You will have to kill me and my family before you get my guns.
Anyone wants to come to my house will get shot in the face. The
right to bear arms is my constitutional God given right and I will
excercise that right til the day I die. whats in this letter is nothing
compared to what ive got planned for you.

All in violation of 18 U.S.C. § 876(c).

COUNT 3

VIOLATION: 18 U.S.C. § 876(c)
[Mailing Threatening Communication]

On or about May 20, 2013, in the Eastern District of Texas, the defendant, **Shannon Guess Richardson**, did knowingly deposit in any post office or authorized depository for mail matter, to be sent and delivered by the Postal Service and knowingly caused to be delivered by the Postal Service according to the direction thereon, a communication addressed to Mark Glaze, The Raben Group, 1640 Rhode Island Ave. NW, Suite 600, Washington, D.C. 20036, and containing a threat to injure the person of the addressee, specifically a letter containing the toxin ricin and the following language:

You will have to kill me and my family before you get my guns.
Anyone wants to come to my house will get shot in the face. The
right to bear arms is my constitutional God given right and I will
excercise that right til the day I die. whats in this letter is nothing
compared to what ive got planned for you.

All in violation of 18 U.S.C. § 876(c).

A TRUE BILL

6-27-13
Date:

DGR
GRAND JURY FOREPERSON

JOHN M. BALES
UNITED STATES ATTORNEY



L. Frank Coan, Jr.
Assistant United States Attorney
Bar No. 170966 (Georgia)
110 N. College, Suite 700
Tyler, Texas 75702
(903) 590-1400
(903) 590-1439 Fax
frank.coan@usdoj.gov

D. Ryan Locker
Assistant United States Attorney
Bar Card No. 24046307
500 State Line Avenue, Suite 402
Texarkana, Texas 75504
(903) 794-9481
(903) 792-5164 (fax)
ryan.locker@usdoj.gov

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION

UNITED STATES OF AMERICA

v.

SHANNON GUESS RICHARDSON

§
§
§
§
§

No. 5:13-CR-_____
(Judge _____)

NOTICE OF PENALTY

COUNT 1

VIOLATION:

18 U.S.C. § 871(a)

Imprisonment for not more than 5 years; a fine of not more than \$250,000; a term of supervised release of not more than 3 years.

SPECIAL ASSESSMENT:

\$100.00

COUNTS 2-3

VIOLATION:

18 U.S.C. § 876(c)

Imprisonment for not more than 5 years; a fine of not more than \$250,000; a term of supervised release of not more than 3 years.

SPECIAL ASSESSMENT:

\$100.00